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Juniper Networks, Inc.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

CISCO SYSTEMS, INC.,)	Case No. 5:14-cv-05344-BLF (PSG)
)	
Plaintiff,)	DECLARATION OF JOSHUA GLUCOFT
)	ON BEHALF OF NONPARTY JUNIPER
v.)	NETWORKS, INC. IN SUPPORT OF
)	ARISTA NETWORKS, INC.'S
ARISTA NETWORKS, INC.,)	ADMINISTRATIVE MOTION TO FILE
)	DOCUMENTS UNDER SEAL (DKT. NO.
Defendant.)	612)
)	
)	Judge: Hon. Beth Labson Freeman

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DECLARATION OF JOSHUA GLUCOFT

I, Joshua Glucoft, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel for non-party Juniper Networks, Inc. (“Juniper”) with respect to the third-party subpoena served by defendant Arista Networks, Inc. (“Arista”) in the above-captioned matter. I am a member in good standing of the State Bar of California and have been admitted to practice before this Court. Where indicated, I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. I submit this declaration in support of Arista’s Administrative Motion to File Documents Under Seal (Docket No. 612), which moves the Court for an order to file under seal, among other things, the following items related to non-party Juniper:

- Select portions of pages 12 and 19 of Arista’s Brief re Analytic Dissection of Asserted Works (the “Brief”); and
- Exhibit 32 to the Declaration of Ryan Wong in Support of Arista’s Brief.

In this declaration, I explain why the material cited above is sealable pursuant to Civil Local Rule 79-5 and provide additional facts in support of Arista’s Administrative Motion to File Documents Under Seal to the extent that the administrative motion pertains to Juniper.

3. Exhibit 32 described above is an excerpt of the transcript of the deposition of Philip Kasten as Juniper’s corporate designee pursuant to a subpoena served on Juniper by Arista, and the relevant portions of Arista’s Brief directly paraphrases that transcript. The transcript reflects substantive discussion of the technical underpinnings and development of Juniper’s highly proprietary software—which contains much information that Juniper maintains as trade secrets. Juniper expends significant effort in maintaining the secrecy of its software architecture and development, including, for example, implementing strict screening procedures for visitors to its engineering campus. Public disclosure of essential nonpublic facts about Juniper’s software development could materially impair Juniper’s intellectual property rights and could cause serious competitive consequences to Juniper’s business positioning.

4. In light of the foregoing, there are compelling reasons to seal the documents described above.

Executed on November 10, 2016 in Los Angeles, California.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

/s/ Joshua Glucoft

Joshua Glucoft